

May 16, 2006

Via Express Overnight Mail

Michael Rafati
U.S. EPA – Region 5
Remedial Enforcement Support Section SR-6J
77 West Jackson Boulevard
Chicago, IL 60604

RE: South Dayton Dump and Landfill Site

Dear Mr. Rafati:

Appleton Papers Inc. ("Appleton") hereby responds to the above-referenced Request for Information from the United States Environmental Protection Agency, Region 5, ("Information Request") dated March 10, 2006 regarding the South Dayton Dump and Landfill Site (aka) Broadway Landfill (aka) Grillots (aka) Moraine Recycling located at 1975 Dryden Road (aka) Broadway (aka) Springboro Pike, Moraine, Ohio (the "Site"). API has been granted extensions of time by yourself and Mr. Thomas Marks of your offices to answer this Information Request by March 17, 2006.

Nothing in the following responses to the Information Request should be construed as a waiver of any defenses that may be available to Appleton, including but not limited to defenses under any state or federal statute, judicial decision, rule, regulation or policy.

Request No. 1:

Identify all persons consulted in the preparation of the answers to these questions.

Response to Request No. 1:

Mark Ferguson, Mill Manager for Appleton Papers Inc.'s pulp and paper mill located in West Carrollton, Ohio (the "Facility").
Nancy McDonnell, Environmental Manager for the Facility.

Request No. 2:

Identify all documents, consulted, examined, or referred to in the preparation of the answers to these questions and provide copies of all such documents.

Response to Request No. 2:

Documents consulted, examined or referred to in the preparation of the answers to these questions consisted of files in the possession of Nancy McDonnell, Environmental Manager for the Facility. No documents were identified or located that relate to or refer to the Site.

Request No. 3:

If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive documents, identify such persons.

Response to Request No. 3:

Appleton has no specific knowledge, information or reason to believe that any person may be able to provide a more detailed or complete response to any question or additional responsive documents.

Request No. 4:

Identify all persons including respondent's employees, who have knowledge or information about the generation, use, treatment, storage, disposal or other handling of waste material(s) at current and former Appleton facilities or of the transportation of waste material(s) generated by current and former Appleton facilities and/or of waste material(s) transported to the above-referenced Site.

Response to Request No. 4:

Nancy McDonnell, Environmental Manager for the Facility is the Appleton employee who has knowledge and information about the generation, use, treatment, storage, disposal or other handling of waste material(s) at Appleton's Facility, the Facility being the only current or former Appleton facility located near the Site. Nancy McDonnell has no knowledge or information about the generation, use, treatment, storage, disposal or other handling of waste material(s) relating in any way to the Site.

Request No. 5:

Copies of all shipping documents or other business documents relating to the transportation, storage, and/or disposal of waste material(s) or substances at current and former Appleton facilities and/or the above-referenced Site.

Response to Request No. 5:

Appleton has no shipping documents or other business documents relating to the Site. Appleton has no shipping documents or other business documents relating to the transportation, storage and/or disposal of waste material(s) or substances at or to the Site from any current or former Appleton facilities, including the Facility.

Request No. 6:

A detailed description of the generic, common, and/or trade name and the chemical composition and character (i.e. liquid, solid, sludge) of the waste material(s) generated by current and former Appleton facilities and/or transported to the above-referenced Site.

Response to Request No. 6:

Appleton has no knowledge, information or documentation suggesting that any waste material(s) generated by any current or former Appleton facilities, including the Facility, was transported to the Site.

Request No. 7:

For each waste material above, please give the total volume, in gallons for liquids and in cubic meters for solids, for which you arranged for disposal and list when those substances were transported to the above-referenced Site.

Response to Request No. 7:

Not applicable. Appleton has no knowledge, information or documentation suggesting that any current or former Appleton facilities, including the Facility, arranged for disposal of any waste material(s) at the Site.

Request No. 8:

What arrangements were made to transport the waste material(s) which were taken to the above-referenced Site? What type of transportation was used (i.e., tankers, dump trucks, drums)?

Response to Request No. 8:

Not applicable. Appleton has no knowledge, information or documentation suggesting that any current or former Appleton facilities, including the Facility, arranged for transportation of any waste material(s) to the Site.

Request No. 9:

Who were the transporters of the waste material(s) Appleton facilities generated, and provide their current address?

Response to Request No. 9:

Not applicable. Appleton has no knowledge, information or documentation suggesting that any current or former Appleton facilities, including the Facility, arranged for transportation of any waste material(s) to the Site.

Request No. 10:

Copies of all records, including analytical results and material safety data sheets, which indicate the identity, amounts, and chemical composition and/or chemical character of the waste material(s) transported to, stored, or disposed at current and former Appleton facilities or transported to or offered for transportation to, storage, or disposal at the Site.

Response to Request No. 10:

Appleton has no records, including analytical results and material safety data sheets, which indicate any Appleton facilities, including the Facility, transported or offered for transportation, storage or disposal any waste material(s) to or at the Site.

Request No. 11:

A description and list of all liability-insurance coverage that is and was carried by current or former Appleton facilities, including any self-insurance provisions that relate to hazardous substances and/or the above-referenced Site together with copies of all of these insurance policies.

Response to Request No. 11:

Appleton has no knowledge, information or documentation suggesting any Appleton facilities, including the Facility, transported, stored or disposed of any waste material at the Site, either directly or through any third party. Any indemnity insurance coverage would require a liability obligation on the part of Appleton, which Appleton does not believe exists in relation to the Site.

Request No. 12:

For each waste material please give the location at which it was disposed of on the Site. Please include a map of the site with disposal locations marked on it.

Response to Request No. 12:

Appleton has no knowledge, information or documentation regarding the location of any waste material(s) disposed of on the Site.

Appleton Papers Inc. purchased the Facility in 1984. To the best of Appleton's knowledge, information and belief, Appleton was never involved in generating any hazardous substances, pollutants or contaminants disposed of at the Site. In addition, to the best of Appleton's knowledge, information and belief, Appleton was not involved in any transportation, treatment, or disposal of such hazardous substances, pollutants or contaminants at the Site.

I certify under penalty of law that I have personally examined and am familiar with the information contained in or accompanying this response document, and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe to the best of Appleton's knowledge that the information contained in or accompanying this response document is true and accurate.

To the extent there may be need for further contact with Appleton, please direct any communications to the following individual:

Tami L. Van Straten
Senior Legal Counsel and Asst. Secretary
Appleton Papers Inc.
P.O. Box 359
1400 N. Rankin Street
Appleton, Wisconsin 54912-0359
Phone – (920) 991-5122
Facsimile – (920) 991-8852
tvanstraten@appletonideas.com

Sincerely,



Mark Ferguson
Mill Manager
enclosures

AFFIDAVIT OF NANCY C. MCDONNELL

STATE OF OHIO)
)
COUNTY OF MONTGOMERY) :ss

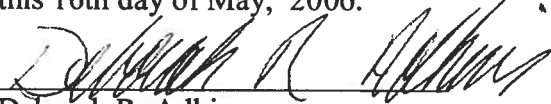
Nancy C. McDonnell, being duly sworn, upon his oath deposes and states:

1. I am over eighteen (18) years old, competent to give this Affidavit, and have personal knowledge of the facts set forth in this Affidavit and referred to in this Affidavit.
2. I am presently the Environmental Manager at Appleton Papers Inc. located in West Carrollton, Ohio. I have held that position since 1998. I have been with Appleton Papers Inc. since 1985.
3. I have reviewed in full the May 16, 2006 Response of Appleton Papers Inc. to the March 10, 2006 United States Environmental Protection Agency Region 5 Request for Information ("Appleton Response").
4. The facts and information provided in the Appleton Response are true and accurate to the best of Appleton's knowledge.

AFFIANT FURTHER SAYETH NAUGHT.


Nancy C. McDonnell

Subscribed and sworn to before me
this 16th day of May, 2006.


Deborah R. Adkins
Notary Public, State of Ohio
My Commission Expires August 15, 2010

DEBORAH R. ADKINS, Notary Public
In and for the State of Ohio
My Commission Expires Aug. 15, 2010

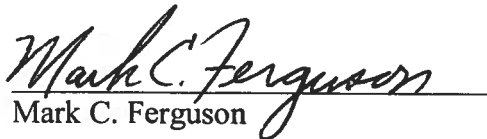
AFFIDAVIT OF MARK C. FERGUSON

STATE OF OHIO)
) :ss
COUNTY OF MONTGOMERY)

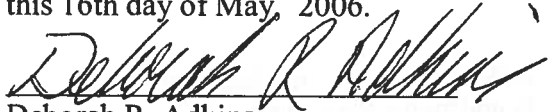
Mark C. Ferguson, being duly sworn, upon his oath deposes and states:

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